

1 Bingham McCutchen LLP
DAVID M. BALABANIAN (SBN 37368)
2 CHRISTOPHER B. HOCKETT (SBN 121539)
JOY K. FUYUNO (SBN 193890)
3 Three Embarcadero Center
San Francisco, CA 94111-4067
4 Telephone: (415) 393-2000
Facsimile: (415) 393-2286

5 Attorneys for Defendant
6 Intel Corporation

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11
12 LAWRENCE LANG, on behalf of himself and
all others similarly situated,

13 Plaintiff,

14 v.

15 INTEL CORPORATION, a Delaware
corporation,

16 Defendant.
17

No. C-05-2957-MHP

STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE FILING DATE
FOR DEFENDANT'S RESPONSE TO
PLAINTIFF'S COMPLAINT

18 IT IS STIPULATED BY AND BETWEEN THE PARTIES, THROUGH THEIR
19 COUNSEL AS FOLLOWS:

20 Pursuant to Civil Local Rule 6-2, Plaintiff Lawrence Lang and Defendant Intel
21 Corporation hereby stipulate that Intel Corporation's response to Plaintiff's complaint shall be
22 due either 60 days after transfer of the above captioned case pursuant to any motion to coordinate
23 or consolidate pre-trial proceedings per 28 U.S.C. Section 1407 or, in the alternative, 45 days
24 after any such motion has been denied. The parties request this extension of time to answer or
25 otherwise respond because the plaintiffs in *Brauch, et al. v. Intel Corp.*, No. C 05-2743 (BZ)
26

STIPULATION AND ~~[PROPOSED]~~ ORDER TO CONTINUE RESPONSE DATE

1 (N.D. Cal., filed July 5, 2005), a related matter, have filed a petition to coordinate or consolidate
2 pre-trial proceedings per 28 U.S.C. Section 1407, and the above-styled action has been identified
3 as a related action to that petition. As a result the outcome of the pending petition will impact
4 significantly the schedule of this case.

5 This is the first stipulation between the parties. Because this litigation has just
6 begun, granting such a stipulation will not have any negative impact on the schedule of this case.

7 IT IS HEREBY STIPULATED.
8 DATED: August 11, 2005

9 Bingham McCutchen LLP

10
11 By: /s/ Joy K. Fuyuno
12 JOY K. FUYUNO
13 Attorneys for Defendant
Intel Corporation

14 DATED: August 16, 2005

15 Trump, Alioto, Trump and Prescott

16
17
18 By: /s/ Mario N. Alioto
19 MARIO N. ALIOTO
20 Attorneys for Plaintiff
Lawrence Lang

[PROPOSED] ORDER TO CONTINUE DEFENDANT'S RESPONSE DATE

IT IS HEREBY ORDERED that Defendant Intel Corporation's response to Plaintiff's complaint shall be due either 60 days after transfer of the above captioned case pursuant to any motion to coordinate or consolidate pre-trial proceedings per 28 U.S.C. Section 1407, or, in the alternative, 45 days after any such motion has been denied.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 19, 2005



Honorable Marilyn H. Patel
United States District Judge